

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
t. Mail No. 2 116 155 616

NOTICE OF VIOLATION

Date of Violation: 1/29, 19 98

No. 36598

RECEIVED
MAR 09 1998

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr</u>		
Location of Violation (Address) <u>3801 E. Marginal Wgs</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 7
- ☐ Section During start up of the kiln SO₂ emissions from the main stack are not to exceed 200ppm SO₂ corrected to 10% oxygen - 1 hour average
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION January 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

3.6.98
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000479



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

May 5, 1998

PSAPCA Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

RECEIVED
MAY 11 1998
AGCW-SEATTLE

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36597

Based on the information you provided to us in your corrective action letter dated April 2, 1998, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. We concur that the excess emissions are excusable pursuant to WAC 173-400-107(6).

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman
Manager - Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer
B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
King County Executive

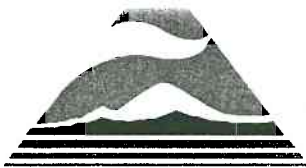
Mayor, Tacoma
City of Seattle
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522
AGCS2M000480



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

December 18, 1998

Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36581

Based on the September 10, 1998, interim CEM civil penalty policy which has not been board approved and which is subject to change, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Neal J. Shulman
Manager - Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

▲ (206) 343-8800

▲ (800) 552-3565

▲ FAX: (206) 343-7522

AGCS2M000481

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Mail No. 116 155 616

NOTICE OF VIOLATION

Date of Violation: 12-1

19 97

No. **36594**
RECEIVED
MAR 09 1998

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>AGCW-SEATTLE</u> <u>Henrik Voldback, Plant Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Wy S</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u> <u>mm</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____ Condition No. _____
- ☒ Section 12.02(a) operation of cement kiln without continuous monitoring of opacity in accordance with Reg I sections 12.03 & 12.04
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1997 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: Paul S. Hunter
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

Date/Time 3.6.98

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000482

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

1. Mail No. 2 116 155 616

NOTICE OF VIOLATION

RECEIVED 36595

MAR 09 1998

Date of Violation: 12-2

19 9

at 9:46 AM

.m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr.</u>	
Location of Violation (Address) <u>3801 E. Marginal Wy S</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____ Condition No. _____
- ☒ Section 12.02(a) Operation of cement kiln without continuous monitoring of opacity in accordance with Reg I Sections 12.03 and 12.04
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1997 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Paul L. Hunter

Issued By: Paul L. Hunter
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

3.6.98
Date/Time

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000483

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

t. Mail No. 2 116 155 616

NO. **36596**

NOTICE OF VIOLATION

Date of Violation: 12-3

19 97

RECEIVED

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, PE/Manager</u> MAR 09 1998 AGUW-SEATTLE		
Location of Violation (Address) <u>3801 E. Marginal Wy S.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____ Condition No. _____
- ☒ Section 12.02(a) Operation of cement kiln without continuous monitoring of opacity in accordance with Reg I Sections 12.03 and 12.04
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION

December 1997 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

Date/Time 3-6-98

Received By: [Signature]

Signing this Notice is not an admission of guilt

AGCS2M000484

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
t. Mail No. 116 155 616

NOTICE OF VIOLATION

Date of Violation: 12-4

19 9

RECEIVED
36597
MAR 09 1998
AGENCY DEPTILE

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Wy S.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip <u></u>	Phone <u>206-623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. , Condition No.
- ☒ Section 9.09(b)(1) Emission of >20% opacity for >3min in 1hr

- ☒ Section 9.09(b)(2) Emission of >5% opacity for a 1 hour average

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1997 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Paul A. Gustafson

Issued By: M. McAfee
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

3.6.98
Date/Time

Received By:

Signing this Notice is not an admission of guilt

AGCS2M000485



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

March 6, 1998

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way South
Seattle, Washington 98134

RECEIVED

MAR 09 1998

AGCW-SEATTLE

Dear Mr. Voldbaek:

Notices of Violation - December 1997

Enclosed are your Notices of Violation (NOV) for the month of December 1997. In your December 1997 CEM report, you describe a number of problems including monitoring violations, emissions violations and kiln start-up, shut-down incidents. We were unable to complete our evaluation of the information you sent, for the following reasons:

- For each period a monitoring or emission violation occurs, the operational status of the kiln needs to be related to the violation event. This will enable us to determine periods of pre-heat without feed, preheat with feed and periods of shut-down and normal operations.
- The maximum hourly opacity readings were not reported for December 3, 1997, or for December 4, 1997. *not listed*
- The maximum three (3) minute opacity readings must be reported, not one (1) minute averages. This is a requirement of Regulation I, Article 12, Section 12.04(f)(1). Since we have made this request before, please be aware that further disregard of this requirement may result in enforcement action.
- No information was provided to show how the opacity monitor lens is maintained and how monitor performance is checked on a daily basis. Please explain what procedures were performed prior to the December 1, 1997, cloudy lens problem and explain any changes made to ensure data quality since this time.

Should you choose to provide any of this information for our consideration, please submit it as part of your ten (10) day written response.

Please feel free to call me at (206) 689-4055 if you have any questions.

Sincerely,

Fred L. Austin
Engineer II

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
King County Executive

Mayor, Tacoma
City of Seattle
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGCS2M000486

110 Union Street, Suite 500, Seattle, Washington 98101-2088
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

APR 20 1998

36708

Registration No. 11339

Cert. Mail No. 2 116 155 647

NOTICE OF VIOLATION

AGCW-SEATTLE

Date of Violation: February 1, 1998 at .m.

Name Ash Grove Cement Co.		Responsible Person, Title Henrik Voldback, Plant Manager	
Location of Violation (Address) 3801 E Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA	Zip 98134	Phone (206) 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____
- ☒ Section 9.09(b)(1) Emission of > 20% opacity for > 3 min in 1 hr. main stack

☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION February CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

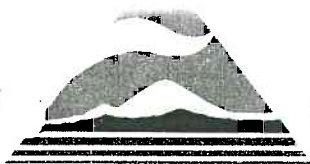
Issued By: 
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 ebc)

4.17.98
Date/Time

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000487



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

April 16, 1998

PSAPCA Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

APR 17 1998


Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36708

Based on the information you provided to us in your February 1998 CEM report, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman
Manager -Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County
Member at Large
Mayor, Everett

Mayor, Bremerton
Snohomish County Council
King County Executive

Mayor, Tacoma
City of Seattle
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX:(206) 343-7522

AGCS2M000488

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

cert. Mail No. 3 116 155 412

No. **36714**

NOTICE OF VIOLATION

Date of Violation: March 26, 19 98

at _____ m.

Name Ash Grove Cement Co.		Responsible Person, Title Gerry Brown	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION III OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____

☒ Section 9.09(b)(1) unlawful to allow the emission of an air contaminant as determined by a CEMS > 20% opacity for > 3 min in 1 hr.

☒ Section 9.09(b)(2) unlawful to allow the emission of an air contaminant as determined by a CEMS > 5% opacity for a 1 hr Average

FACTS ALLEGED TO CONSTITUTE A VIOLATION March 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

6.10.98

Date/Time

Received By: _____

Signing this Notice is not an admission of guilt

AGCS2M000489

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Cert. Mail No. 7 116 155 412

No. **36710**

NOTICE OF VIOLATION

Date of Violation: April 26th 3, 19 98 at _____ m.

Name <div style="font-size: 1.2em; font-family: cursive;">Ash Grove Cement Co.</div>	Responsible Person, Title <div style="font-size: 1.2em; font-family: cursive;">Gerry Brown</div>		
Location of Violation (Address) <div style="font-size: 1.2em; font-family: cursive;">3801 E Marginal Way So.</div>	City <div style="font-size: 1.2em; font-family: cursive;">Seattle</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>	County <div style="font-size: 1.2em; font-family: cursive;">King</div>
Mailing Address <div style="font-size: 1.2em; font-family: cursive;">As Above</div>	City, State <div style="font-size: 1.2em; font-family: cursive;">Seattle, WA</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>	Phone <div style="font-size: 1.2em; font-family: cursive;">623-5596</div>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

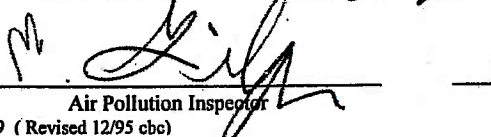
- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____

☒ Section 9.09(b)(2) unlawful to allow the emission of air contaminants as determined by a CEMS that is greater than 5% opacity for a 1 hr. Average.

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By:  Date/Time: 6.10.98 Received By: _____
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

Signing this Notice is not an admission of guilt
AGCS2M000490

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36711**

Cert. Mail No. E 116 155 412

NOTICE OF VIOLATION

Date of Violation: April 22, 19 98 at .m.

Name Ash Grove Cement Co.		Responsible Person, Title Gerry Brown	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. , Condition No.
- ☒ Section 9.09(b)(2) Unlawful to allow the emission of an air contaminant as determined by a CEMS that is greater than 5% opacity for a 1 hr. Ave.

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

6-19-98
Date/Time [Signature]

Received By:
Signing this Notice is not an admission of guilt
AGCS2M000491

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Cert. Mail No. 2116 155 412

No. **36712**

NOTICE OF VIOLATION

Date of Violation: April 25, 1998 at _____ m.

Name Ash Grove Cement Co.	Responsible Person, Title Gerry Brown		
Location of Violation (Address) 3801 E Marginal Way So.	City Seattle	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone 623-5596

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☒ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. _____, Condition No. _____

☒ Section 9.09(b)(2) unlawful to allow the emission of an air contaminant as determined by a CEMS that is greater than 5%
opacity for a 1 hr. Ave.

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

6.10.98
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt

AGCS2M000492

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 24, 1998

Ms. Melissa McAfee
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notices of Violation Nos. 36710; 36711; 36712; 36714

Dear Ms. McAfee:

Your letter of June 10, 1998 requests information on the main kiln baghouse. Attached for your review are inspection and maintenance logs for the main baghouse through April 1998. These logs are for external inspection (non compartment entry), Internal (Module entry) and records specifically for compartment Nos. 03, 04, 07 and 11 relating of the event shown on the above NOV's.

All opacity events were caused by bag component failures. It is impossible to predict bag failure and bags are replaced when inspection warrants or after failure. No bag in the main baghouse exceeds 2 years old. When indicated by opacity readings, plant operators and or maintenance evaluates as quickly as possible each of the 11 modules that comprise the baghouse and isolating (shutting down) the offending module(s). Repairs are normally performed by the maintenance department but the production department routinely assists in effecting repairs. The table below shows the action taken to eliminate the opacity event

NOV	Date	Limit	Cause	Duration	Module No
36712	04/25/98	5%	broken bags	1	11
36711	04/22/98	5%	broken bags	1	11
On 4/22, the baghouse was inspected when opacity appeared, believed the cause to be in #11 and isolated compartment #11. The kiln shutdown shortly after for 36 hours for refractory repair. On 4/23, #11 was inspected and no deficiencies were found. On 4/25 opacity appeared and #11 was taken off line until repairs were completed on 4/27.					
36710	04/03/98	5%	broken bag	4	03
During preheating the kiln on 4/03, the baghouse was inspected when opacity appeared, the cause was traced to #03 and the compartment was isolated and repairs completed on 4/03.					
36714	03/26/98	5 & 20%	broken bags	3	07 & 04
At 20:00 on 3/26, the operator inspected the baghouse when opacity appeared, believed the cause to be in #7 and isolated the compartment at 21:15. At 23:06 on 3/26 opacity spiked the operator inspected the baghouse, believed the cause to be in #4 and isolated the compartment at 23:11. Repairs were completed 3/27.					

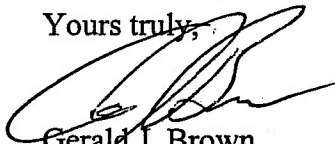
AGCS2M000493

Maintenance performs inspections both external and internal. During March and April 1998 8 external inspections and 10 module entry maintenance/inspections were conducted to retain the baghouse efficiency. The below is a demonstration that the events are not of a reoccurring nature. As the main baghouse is made of 11 individual modules, no one module demonstrates a pattern of re-occurrence.

Date of Opacity	Cause	Module No.
04/25/98	broken bags	11
04/22/98	broken bags	11, inspected 4/23 no defects found.
04/03/98	broken bags	03
03/26/98	broken bags	07 & 04
02/01/98	broken bags	05
11/01/97	broken bags	06 & 09
09/17/97	loose bags	02
09/08/97	broken bags	No. not noted by the production department that performed repairs.
01/27/97	steam event	

Please call me should you require additional information.

Yours truly,



Gerald J. Brown
Manager Safety and Environment

cc: Henrik Voldbaek

Main Baghouse Module Inspection Sheet

Date	Module	Remarks
03-16-98		This is a new addition to my log and records. A Note sheet for the Bag House in General, other than just module sheets. We have been having problems with a high D.P. Indication across the main Bag House. We do not know yet if it is all instrumentation or other mechanical problems. We will be performing tests and troubleshooting daily to solve the problem. We have re-calibrated Rosemount gauges, cleared out instrumentation lines, changed process speeds, damper locations etc. Opacity has not been a problem at all.
03-20-98		I Inspected all of the Inlet and outlet ducting for the main Bag House, because we have had an ongoing problem with high D.P. across the main Bag House. I found only 1 hole, but it was the problem. It was about 24" X 40" in size. Causing us a lot of grief for the process. It was above the cyclone for the Raw mill.
03-26-98		Nelson Industrial came out and repaired the ducting during a Raw mill P.M. Day today. Alex Perez Pre-cut and Fabricated the plate for the repair to help save time for daily. This solved our D.P. problem and let our Fans Ramp Down a bit.
04-02-98		Kiln is ↓ so I Inspected 2 modules as well as the baghouse externally. We will need to Insulate the walls around the lower doors and Insulate the new doors as well.
04-06-98		Valves on main Bag House are needing some work. We are starting to see some Fatigue or function failure.
04-08-98		I showed Lonnie the Reverse air Damper. It is positioned at 50%. When the Raw mill goes ↓ we need to open it up to about 80% to keep the D.P. ↓. Then when the Raw mill comes back up we need to throttle the Reverse air back down or the bags will not have adequate air flow while mill is up.
04-09-98		Reverse air bit us. the Raw mill went ↓ and no one on shift throttled the damper open. The Bag House loaded up and caused a high D.P. We opened up the reverse air and we Flashed the system with Return Dust. Lesson learned I hope. Also module #4 outlet valve was stuck closed.

Kodger 15155

Baghouse EXTERIOR

NON-Compartment Entry

Main Baghouse Module Inspection Sheet		
Date	Module	Remarks
04-13-98		342.045, Reverse air on the main Bag House needs to be inspected. There is a bulge in the housing that indicates that something has went through the fan at one time and may have caused some damage. The damper needs inspected as well.

1500 per 14.55

Module Entry

Main Baghouse Module Inspection Sheet		
Date	Module	Remarks
6-94	1-11	Main B/H changeout perform by Menardi Cristwel
7-22	#11	Na / Leakage
8-5	#10	Na / Leakage
8-6	#9	Na / Leakage
9-2	4 & 8	Na / Leakage
10/28-29	-	Replaced Rear Seal module # 2, 5, 9, 10
2-12-95	#1 - #11	Tube sheet Replaced in #10 & #3 & #7 Thimble (B.C.)
6-27-95	#1 - #11	Na / Leakage
12-5-95	#6 & #2	minor leakage; corrected Problem.
1/8-96	#1 - #11	Compartment Insp. module #9 leakage
1/9-96	#1 - #11	Damper Insp. The Sweep Damper & Reverse Air
2/27/96	#1 - #11	Damper broken; Repair before start up.
4/8/96	#1 thru #11	Inspected and noted on baghouse Bag locator chart (Bags needing to be change)
11/97		Inspected and noted Repair Job and bags changed this inspection
		Inspected module #1 Thru #11 note work that was perform in D/C Records Journal
4/97		Compartment Insp.
5/2/97		Completed baghouse Inspection (1 thru 11)
10/30/97	#6	Repair Hole In Wall Installed 33 Filters 10/31/97
11-2-97	#9	Inspected and Repair Hole / changeout 2 Filter
11-3-97	#10	Repair hole In Wall / changeout 48 Filters
11-5-97	#1	Swept out compartment / No Leakage
11-6-97	#2	Swept out Compartment / No Leakage
11-7-97	#3	Swept out Compartment / No Leakage
11-10-97	#4	changeout 10 Filters / swept out compartments.
12-31-97	#11	Inspect, scrap Corrosion metal Flakes off of walls, All spring tension is gone in every bag, (bags loose), Swept down by and taken of module. Dampers are leaking air, a silicoid plate broke loose on the south west wall, we need to add patch on wall
01-07-98	#4	(New Ann) Inspect for Corrosion of steel on new roof
01-20-98	#4	opened up for floor metal to evaluate time, days & bags
01-21-98	#7	lower bag down, front 4 rows, for sand blasting and painting
01-21-98	#10	" " " "
01-30-98	#10	buy off of Thimble from denary during outage.
02-02-98	#5	patch up walls, Vacuum out module, replaced bag with hole in it
02-13-98	#3	opacity spikes, Holes in wall around data holes in bag, Attention for
03-11-98	#11	Hole in bag from Corrosion in walls.
03-27-98	#4	Bag clamp busted causing bag to blow off of thimble. Compartment filled with dust and caused opacity spikes.
03-27-98	#7	Hole in bag, size of finger on west wall half way down, caused module to fill with dust on cause opacity spikes.
03-20-98	Ducting	Found Big Hole in duct above cyclone over raw mill causing a high D.P.
03-26-98	Ducting	Nelson repaired the hole in ducting solving our high D.P. problem.
04-02-98	#10	Kiln & P.M. Inspection, replace 5 bags, vacuum, metal work. See module #10 spec. sheets.
04-02-98	#11	Kiln & P.M. Inspection, replace 2 bags, vacuum
04-03-98	#3	Kiln → coming ↑ we had constant 5-6 opacity then spike down to 1.0. Isolated and fixed busted bag and the hole in wall

Kodger 6/35

Module Entry

Main Baghouse Module Inspection Sheet		
Date	Module	Remarks
04-06-98	#7	Visited the baghouse on 4/6/98 for the
04-07-98	#7	Opacity today from a busted bag made us have to go inside.
04-23-98	#6	Kiln & P.M. on module #6, see files under #6
04-23-98	#7	Kiln & P.M. on module #7, see files on module #7
04-23-98	#11	Kiln & P.M. on module #7, see files on module #7

Main Baghouse Module Inspection Sheet		
Date	Module	Remarks
02-13-90	#3	<p>Opacity spikes all night last night coming from this module. I trouble shot it and took it off line. It was the worst module I have ever walked into. Kiln dust was 12" deep at the door and tapered all the way to the back wall at 2" deep. There is massive corrosion on the South wall and on the South west wall. The metal hanging out of the wall around sliced the South west bag opener. This door needs to be replaced, the whole dam is corroded out. All of the bags are loose. I re-tensioned all of the bags except for 10. I ran out of time. Walked up the module and put it back on line. Opacity was good then.</p>
04-03-98	#3	<p>Kiln → coming up today and we have opacity constantly 5-10. I trouble shot it to be module #3. I isolated the module and went inside. I found a little dust on the floor and bags due to the fact we have no feed on. I found the torn bag (see bag locator) and a big gash in the bag west wall up front (see bag locator) with a rupture hole developing in the South wall of the door on the west side. Basic patched the holes, I replaced the one burst bag and we put the module back on line.</p>

Module #7

Main Baghouse Module Inspection Sheet

Date	Module	Remarks
01-07-98	#4	opened up module to inspect the new door that has been installed. I noticed a lot of corrosion due to lack of a corrosion resist coating.
01-20-98	#4	opened up module so that ^{Dunkin and Bush} can come in and inspect to sand blast and paint. we left module open until 01-24-98. Dunkin and Bush sand blasted the module and painted a 2 layer corrosion resist coating. #1 was a zinc layer and #2 was a sealers. I had to knock down the first 4 rows of bags so I had to pull the back up. Clean the module out re-tension the bags and put it back on line. Module #4 also has a crack in the tube sheet flange that will need to be repaired. Talk my back on the right hand side.
03-27-98	#4	today I came in to work and was informed that module #4 and module #7 were off line due to opening spindles. Scott Schaefer started working module #4. He found the problem, a big hole came off the thimble due to a broken clamp that had failed. He also had the module all uncoupled out and ready to go. All I had to do was re-inspect the hole compartment. Re-clamp the bag and tension a few bags. Dave Smith advised me and uncoupled over the module again real quick. we put it back on line and life was good.
02-25-98		
04-07-98	#4	Today this compartment I isolated it self with a sticky cylinder valve up top on the outlet air damper. I wrote a work request to look at valve and linkage, we may start seeing cylinder or linkage failure soon. I oiled up the linkage for now.

Module #1

Main Baghouse Module Inspection Sheet

Date	Module	Remarks
01-21-98	#7	opened up module for Dunkin & bush to sand blast and paint. we lowered the bags down in bag. First 4 rows, when they finished they went I went in and cleaned out module, pulled up bags, tensioned them and put it back on line in the 24th. work was performed during outage in cold bag house. they did a 2 coat Gerson Rust job. #1 was a zinc coat. #2 was a sealer. this compartment has a new bit A liner door.
03-27-98	#7	This module was taken off line due to opacity spikes just after module #4 was taken off line. I came in to work today and add with module #4 first. Then when I got to module #7 I found a bag with a hole in it on the west wall, mid way back. Causing the module to fill with dust and cause opacity spikes. I replaced the ore bag along with another toward the front. They took a little work from rubbing on the angle iron above the door. Then Dave and I re-clamped some bags, tensioned some bags and vacuumed out the module. we put it back on line and life was good.
04-07-98	#7	This module was causing mild opacity. we were not out of compliance in spikes or average. I had Tom look at the graph and he saw a mild 3.5 - 4.0 spike every 20 min., with a constant opacity of about 1.5 - 2.0. I pinpointed the problem to be module #7 and isolated it. I went in side to find 1 bag with a hole in it. I had Alex Perez cut back the steel on the wall from the row over installation. I replaced the bag and several clamps. I tensioned the bags, cleaned the module out and put it back on line. See bag locator sheet for metal work site and Busted Bag.
04-23-98	#7	I opened up this module today because we took the Kiln & out for a Hot spot. I performed PM, in this module as well as 6-11. I replaced several bags that looked as if they may fail soon, vacuumed it out and put it back on line 04-23-98.

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36716**

Cert. Mail No. 2 116 155 412

NOTICE OF VIOLATION

Date of Violation: March 16, 1998 at _____ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Gerry Brown</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☒ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 8

- ☒ Section 12.02(c) Unlawful to operate equipment which is required to use a CEM through an order of approval without the continuous monitoring of emissions in accordance with the requirements of sections 12.03 and 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION Less than 90% valid CEM data during kiln operation per the March 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Please see corrective action order in enclosed letter

[Signature]

Issued By: [Signature]
Air Pollution Inspector

6-19-98
Date/Time

Received By: _____

Signing this Notice is not an admission of guilt
AGCS2M000502

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36717**

Cert. Mail No. 2116 155 412

NOTICE OF VIOLATION

Date of Violation: March 17, 19 98 at _____ m.

Name <u>Ash Grove Cement Co</u>		Responsible Person, Title <u>Gerry Brown</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
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- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
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- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 8
- ☒ Section 12.02(c) Unlawful to operate equipment which is required to use a CEM through an order of approval without the continuous monitoring of emissions in accordance with the requirements of Section 12.03 & 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION Less than 90% Valid CEM data during Kiln operation per the March 1998 CEM report.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Please see corrective action order in enclosed letter.

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

Date/Time 6.19.98

Received By: _____
Signing this Notice is not an admission of guilt.

AGCS2M000503

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36715**

rt. Mail No. 116 155 412

NOTICE OF VIOLATION

Date of Violation: March 4, 19 98 at _____ m.

Name <div style="font-size: 1.2em; font-family: cursive;">Ash Grove Cement Co.</div>	Responsible Person, Title <div style="font-size: 1.2em; font-family: cursive;">Gerry Brown</div>		
Location of Violation (Address) <div style="font-size: 1.2em; font-family: cursive;">3801 E. Marginal Way So.</div>	City <div style="font-size: 1.2em; font-family: cursive;">Seattle</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>	County <div style="font-size: 1.2em; font-family: cursive;">King</div>
Mailing Address <div style="font-size: 1.2em; font-family: cursive;">As Above</div>	City, State <div style="font-size: 1.2em; font-family: cursive;">Seattle, WA.</div>	Zip <div style="font-size: 1.2em; font-family: cursive;">98134</div>	Phone <div style="font-size: 1.2em; font-family: cursive;">623-5596</div>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 8
- ☒ Section 12.02 (c) Unlawful to operate equipment which is required to use a CEM through an order of approval without the continuous monitoring of emissions in accordance with the requirements of Sections 12.03 & 12.04

FACTS ALLEGED TO CONSTITUTE A VIOLATION Less than 90% valid CEM data during kiln operation per the March 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Please see the administrative order in the enclosed letter

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

6.10.98
Date/Time [Signature]

Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M000504

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

No. **36713**

Mail No. 116 155 412

NOTICE OF VIOLATION

Date of Violation: March 8, 19 98 at _____ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Gerry Brown</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☒ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(c)
- ☐ Section Main stack emissions are not to exceed 180 ppm SO₂ 1 hr Ave.
during normal operations
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION March 1998 CEM report

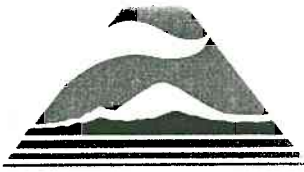
CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

By: [Signature]
Air Pollution Inspector
70-119 (Revised 12/95 cbc)

6.10.98
Date/Time 1/11

Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M000505



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

December 18, 1998

Registration No. 11339

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

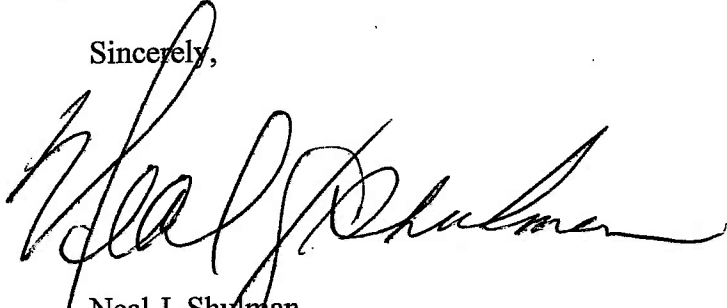
Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36713, 36714, 36710, 36711, 36712

Based on the March and April 1998 CEM reports and the draft interim CEM policy dated September 10, 1998, you provided to us this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman
Manager - Inspection

EMG:VJD

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

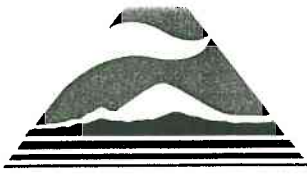
110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGCS2M000506



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

October 13, 1998

Mr. Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

Dear Mr. Voldbaek:

Disposition of Notice of Violation No. 36227

Based on the information you provided to us in your March CEM report dated April 19, 1998, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4026.

Sincerely,

Elizabeth M. Gilpin
Inspector II

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Margaret Pageler, City of Seattle, Board Chair
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
Dave Somers, Snohomish County Council
Ron Sims, King County Executive

Brian Ebersole, Mayor, Tacoma
Charlotte Garrido, Commissioner, Kitsap County
Doug Sutherland, Pierce County Executive

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 22, 1998

Ms. Melissa McAfee
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notices of Violation No. 36715; 36716; 36717

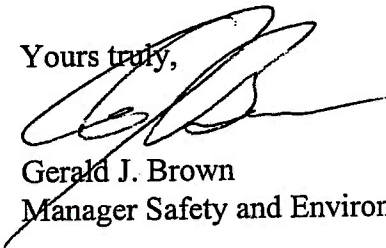
Dear Ms. McAfee:

Your letter of June 10, 1998 states that the monitor down time cited in the above NOV's is in violation of both the current Regulation I, Article 12 and the revised Regulation I Article 12 effective June 1, 1998. The "current" Regulation I Section 12.03 (h) specified how much monitor down time invalidates the data, but Regulation I does not impose any minimum data recovery requirement for CEM operators.

The Amended Regulation I, Article 12 Section 12.03 (b) requires that CEM data is recovered for at least 95 % of the hours that the equipment monitored is operated during each calendar month with exceptions. The March 1998 CEM report submitted shows that the CEMs recovered data at least 97.6% of the required time. Section 3 (f) (5) of the Amended Regulation I, Article 12 sets reporting requirement to explain each failure to recover valid monitoring data for least 90% of the hours the monitored equipment was operated each day. The March 1998 CEM report contains this explanation as well.

As such, these incidences did not violate the Regulation I, Article 12 in effect during March 1998. Further, we believe these incidences would not have violated the Amended Regulation I, Article 12. It would, however, be helpful for future compliance with the new rule to receive clarification on this issue.

Yours truly,



Gerald J. Brown
Manager Safety and Environment

cc: Henrik Voldbaek

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
Mail No. 580 038 810

NOTICE OF VIOLATION

No. 36679
RECEIVED

Date of Violation: May 25, 19 98

OCT 30 1998
OCT 30 1998

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Plant Mgr</u>		
Location of Violation (Address) <u>3801 E Marginal WYS</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>206-623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6B Unlawful to emit >501 ppm NOx, 24hr average, from main baghouse
- ☐ Section _____
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION May 1998 CEM Report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

If WAC 173-400-107 applies, provide adequate demonstration showing known causes, corrective actions, & preventive measures to be taken per Condition 3 and Condition 4 demonstrate how emissions could not be prevented through careful planning & design.

Issued By: [Signature]
Air Pollution Inspector
Form No. 70-119 (Revised 12/95 cbc)

10-29-98
Date/Time

Received By: _____
Signing this Notice is not an admission of guilt
AGCS2M000509

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. 580 038 832

No. 36721

NOTICE OF VIOLATION

RECEIVED

Date of Violation: October 15th and 30th, 19 98

at _____ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Gerald Brown EH & S Mgr.</u>		
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>206 623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 7183, Condition No. 5(b)
- ☐ Section NOx shall not exceed 700 ppm corrected to 10% O₂ for a 1 hr. Ave.
NOx shall not exceed 501 ppm corrected to 10% O₂ for a 24 hr. Ave
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION Causing or allowing > 501 ppm NOx on 10/15 and 10/30. Causing or allowing > 700 ppm for a 1 hr. Ave on 10/30 from the main stack as reported in the October 1998 CEM report

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

please provide further identification of the exact cause of the coal feeder malfunctions and corrective actions/long-term proposal to resolve the problem

Issued By: [Signature]
Air Pollution Inspector

12.24.98
Time 11:11

Received By: _____

AGCS2M000510
Signing this Notice is not an admission of guilt

ASH GROVE CEMENT COMPANY

“WESTERN REGION”

January 8, 1999

Ms. Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notices of Violation No. 36721

Dear Ms. Gilpin:

The above NOV requests further identification of the exact cause of the coal feeder malfunction and corrective action with long term proposal to resolve the problem.

The Addendum to the October 1998 CEM report states that on 10/15 the powdered coal feeders were unable to control creating an unstable kiln and short term spikes of combustibles in the system. On 10/30, the main powdered coal feeder began leaking coal and was shut down forcing a switch to natural gas. This switch to natural gas resulted in a NOx exceedance since the chemistry for the raw feed was configured for coal fuel.

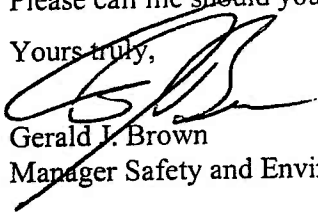
Both incidences were due to a mechanical malfunction in the coal feeder to the main burner of the kiln. This feeder manufactured by Pfister, controls the rate at which the powdered coal is delivered to the burner. It was determined the clearance between the rotor and the rotor housings had increase due to normal wear causing the coal to be feed to the burner at an inconsistent rate.

Work to repair the feeder began on 10/15 at 9:45 a.m. and upon determining the cause of the malfunction, new rotor and both top and bottom housings were ordered from Pfister. The feeder was returned to service at 2:00 p.m. following repairs that included new bushings, seals and bearings. On 10/30 it was discovered that due to the increased clearance between the rotor and the rotor housing powdered coal was leaking (being forced passed the seals by system air pressure) from the feeder. To prevent further damage to the coal transport system the coal feeder was shut down to correct this defect.

Replacing the rotor and rotor housing is believed to be the long-term resolution. The parts delivery is expected to be in February with installation soon following.

Please call me should you require additional information.

Yours truly,


Gerald J. Brown
Manager Safety and Environment

cc:HV

AGCS2M000511

PUGET SOUND AIR POLLUTION CONTROL AGENCY)
a municipal corporation of the state of Washington)
110 Union Street, Suite 500)
Seattle, Washington 98101-2038)

VS

ASH GROVE CEMENT COMPANY
c/o Henrik Voldbaek, Plant Manager
3801 East Marginal Way South
Seattle, Washington 98134

MAR - 5 1999
AGCW-SEATTLE

NO. 8972

**NOTICE AND ORDER
OF CIVIL PENALTY**

You are hereby notified that, pursuant to Chapter 70.94 RCW and Notice of Violation No. 36721, a copy of which has been previously provided to you or your agent, you have violated Condition 5(b) of the Order of Approval for Notice of Construction No. 7381 of the Puget Sound Air Pollution Control Agency in the following particulars:

On or about October 15 and 30, 1998, at 3801 East Marginal Way South in the city of Seattle, King County, state of Washington, you caused or allowed NOx emissions in excess of 501 ppm corrected to 10% O2 for a 24-hour average in violation of Condition 5(b).

As a result of the foregoing violations, a penalty is assessed against you as follows:

For the violation that occurred on or about:

October 15, 1998	\$1,000.00
October 30, 1998	<u>\$1,000.00</u>
Total Penalty	\$2,000.00

The full amount of this penalty is due and payable within thirty (30) days of receipt of this notice, unless within such time a request for hearing is filed. (See reverse side for both mitigation procedures and appeal procedures.)

In the event the full amount of this penalty is not paid on or before thirty (30) days of receipt of this notice, or a request for mitigation has not been made to this Agency, or a request for hearing has not been made to the Pollution Control Hearings Board of Washington and the Air Pollution Control Officer, action will be commenced in court to recover such penalty.

Dated this 3rd day of March 1999.

OK
GP
3/11/99

Dennis J. McLerran
Air Pollution Control Officer

Neal J. Shulman
by Neal J. Shulman
Manager - Inspection

Certified Mail No. Z 580 038 972

AGCS2M000512

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

November 10, 1998

Ms. Melissa McAfee
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notice of Violation # 36679

Dear Ms. McAfee:

The above NOV requires a response stating the corrective actions taken to achieve compliance.

The NOx exceedance on May 25, 1998 occurred during a start up of the kiln. The kiln was shut down at 16:40 hrs. 05/24 because of a plug that developed in the 5th stage of the preheater. Flame was put back in the kiln at 00:00 hrs on 05/25 once the plug was removed. There was nothing unusual about this startup. Feed to the kiln was put on at 03:05 hrs on 5/25 after only 6 hours of down time. This was a warm kiln start using 100% coal and coal is generally lower on NOx. The operator correctly identified and made appropriate steps to control and reduce NOx emission by increasing the feed rate, reducing the fuel rate and controlling the draft.

With the exception of startup, there are no known cause(s) that contributed to excess NOx generation. Excess NOx was not present prior to the shut down there were no change in the feed type or fuel. We believe that WAC 173-400-107(4) Excess emissions due to startup or shutdown conditions is applicable to this incident.

Please let me know if you have any further question.

Yours truly,

Gerald J. Brown
Manager Safety and Environment

Copy: Henrik Voldbaek

AGCS2M000513